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TANK CONFERENCE

Truck Trailer Manufacturers Association

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RSPA - 2002 - 12616-1

Richard P. Bowling
President

February 4, 1999

177595

Kelley S. Coyner
Administrator, DRP-1
Research and Special Programs Administration
U.S. Department of Transportation
400 Seventh Street, S.W.
Washington, D.C. 20590

**Subject: Petition to Revise 178.345-5(f) to Eliminate Marking of
Fittings Mounted on Manhole Covers**

Dear Ms. Coyner:

We petition for a revision of 178.345-5(f) to read as follows where brackets indicate deletions.

§178.345-5 Manhole assemblies.

* * *

(f) All fittings and devices mounted on a manhole cover, coming in contact with the lading, must withstand the same static internal fluid pressure [and contain the same permanent compliance markings] as that required for the manhole cover. The fitting or device manufacturer shall verify compliance using the same test procedure and frequency of testing as specified in §178.345-5(b).

* * *

We are not aware of any failures of fittings installed in manholes to withstand the required pressure. Presently such fittings are not marked with the information required on manholes per 178.345-5(e), namely,

- (1) Manufacturer's name;
- (2) Test pressure _____ psig.
- (3) A statement certifying that the manhole cover meets the requirements in §178.345-5.


Kelley S. Coyner

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Fittings installed in manholes may include caps, valves, and cam lock connections. These same fittings are used in applications other than in cargo tank manholes. In some cases, there may be no incentive to a manufacturer to comply with the marking requirements due to the low volume application to cargo tanks.

Sincerely,

A handwritten signature in black ink, reading "Donald W. Vierimaa". The signature is fluid and cursive, with the first name "Donald" being the most prominent.

Donald W. Vierimaa
Vice President-Engineering

DWV/mm

cc: Tank Conference Engineering Committee
Tank Conference Associates